

SEMERARO & FAHRNEY, LLC

R. Scott Fahrney, Esq. | SBN # 017182008

155 Route 46, Suite 108

Wayne, New Jersey 07470

TEL. (973) 988-5070

Email sfahrney@semerarolaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DAVID J. LORENZO,

Plaintiff

vs.

THE BOROUGH OF PALISADES
PARK, NEW JERSEY; CHONG
PAUL KIM (individually and in his
official capacity as Mayor of the
Borough of Palisades Park, New
Jersey); and SUK “JOHN” MIN
(Individually and in his official
capacity as a member of the Borough
Council of Palisades Park, New Jersey)

Defendants.

CIV No.: 2:23-CV-21849-CCC-JRA

A Civil Action

ORDER

I, R. Scott Fahrney, Esq., being of full age, herby certifies as follows:

1. I am an Attorney at Law of the State of New Jersey, licensed to practice before this Court, and am a Partner of the Law Firm of Semeraro & Fahrney, LLC.
2. The undersigned firm has been assigned by the South Bergen Municipal Insurance Fund to represent the Defendants, the Borough of Palisades Park, Chong Paul Kim, and Suk “John” Min, (hereinafter referred to as “Defendants”), with regard to the above captioned matter.
3. As such I am fully familiar with the facts herein.
4. I make this certification in support of the Defendants’ Motion to Extend Time to respond to Plaintiff’s complaint to September 16, 2023, pursuant to Fed. R. Civ. P. 7(b) and L. Civ. R. 7(m).

5. This matter was initially assigned to my firm on November 27, 2023, with a pending default date approaching. Initially, the undersigned filed an application for the clerk's extension to preserve my client's rights, with the intent that I would obtain documents from the Borough to formulate an answer within that time.
6. At the present time, I am gathering the file from the Municipal Attorney and from the City so that I may prepare a responsive pleading, conduct diligent investigations as to the Plaintiff's complaint, and obtain all necessary documents for the defense of my client.
7. Due to a change in Municipal Attorney that occurred last week, there has been an unexpected delay in receiving documents for this matter.
8. While the Court has granted the Defendants' Application for a Clerk's Extension to December 15, 2023, it is respectfully requested that the Court grant this extension so that the undersigned has an opportunity to retrieve the full file and all documents referenced in the complaint, and meet with my clients in order to prepared an appropriate response.
9. The relief requested in this motion does not impact any other deadlines in this case.
10. In light of the above, Defendants respectfully request that this Court grant Defendants' an extension of time to answer or otherwise respond to Plaintiffs' Complaint until January 16, 2024.
11. A proposed order is attached hereto.

I certify under penalty of perjury that the foregoing statements are true and correct.

Semeraro & Fahrney, LLC
Attorneys for Defendants

By: 

R. Scott Fahrney, Esq.,

Dated: December 15, 2023